Chapter 8. RESPONSES TO COMMENTS

8.1 List of Comments Received

One letter from Huey D. Johnson of the Resource Renewal Institute was received by the Department during the public review period, with comments regarding the draft environmental document (DED). The following is the Department's response to these comments. The actual letter is provided following the Department's response to comments.

8.2 Department Response to Comments

Comments from Huey D. Johnson, Resource Renewal Institute

The Department appreciates the time and effort that Mr. Johnson took to comment on the Draft Environmental Document on Pacific Herring Commercial Fishing Regulations. Citations referring to the Draft Environmental Document (DED) are provided by section number.

Comment 1-1: I do not agree that we should be netting herring in the San Francisco Bay. The interesting recovery of the salmon stocks and potential of them improving rests, I believe, on the availability of biomass in the form of these smaller fish. I further am convinced that we do not yet understand enough to link the need of larger predators and mammals for that matter.

Response 1-1: See sections 3.2.1.8.1, 4.2.6.2, and Appendix 3. The assessment provided in the DED on trophic level impacts to predators was based on the importance of herring in predator diets, and a determination of whether those that consume herring were identified to be food limited at the population level. This, coupled with a relatively low commercial harvest rate lead to the assessment that impacts were localized, short-term, and less than significant.
The annual commercial harvest is less than 20 percent (generally 15 percent) of herring spawning biomass, which takes into consideration Pacific herring's importance as a forage fish. When non-spawners are also considered (young-of-the-year, one-year-olds, and immature two-year-olds), the percentage of the total herring population biomass that is harvested is even lower. This, coupled with with the fact that most higher trophic level predators use large areas and interact with a wide set of food species reduce the risk of potential impacts.

Comment 1-2: I would argue that the market effect of the salmon is far greater in the economy of the Bay Area and California than any herring roe is in Japan.

Response 1-2: The comment is noted. When comparing ex-vessel values, the herring fishery consistently ranks among the top 3 in California.

Comment 1-3: There is a great need to have an honorable economic study done on the comparative returns of big fish for commercial uses and big fish for other predator species enjoyed by the fishing public. Please consider the importance of these economic studies and realize the disastrous track record of managing fisheries with "make believe" economic models rather than factual biological programs.

Response 1-3: See Response 1-1. The management plan for Pacific herring provides for its importance as forage for predators. It is not based on any economic model, but rather a population dynamics model which considers biological parameters. Having provided for herring

as a food source to predators, the Department does not believe that there is a connection between the size of salmon stocks and the harvest of herring.